



SHEPS LAW GROUP

Attorneys at Law

25 High Street • Huntington, NY 11743 • Tel (631) 249-5600 • Fax (631) 249-5613

March 30, 2018

VIA ECF

The Honorable Sarah Netburn, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square New York, NY 10007

Re: *In Re Terrorist Attacks on September 11, 2001*; 03-md-1570 (GBD)(SN)
The Charter Oak Fire Ins. Co. et al v. Al Rajhi Bank et al; 1:17-cv-02651
Sheps Law File No.: 7156

Dear Judge Netburn:

If you recall, we represent The Charter Oak Plaintiffs in the above referenced matter (the "Charter Oak Action").

In accordance with this Court's Order dated December 4, 2017, *ecf* no. 3833, we write to provide a status update as to Plaintiffs' claims against certain Non-Sovereign Defendants named in Plaintiffs' complaint. We were directed to write to this Court to file a status letter after motions to dismiss filed by other various non sovereigns were decided.

If you recall, with respect to those defendants who have appeared and have been active in the MDL litigation (The Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, and Dallah Avco Trans Arabia), we had previously spoken and agreed with each of their respective counsel concerning a Stay of Service of Plaintiffs Charter Oaks' claims until May 1, 2018. (During such time we would not serve the filed complaint against them nor require an Answer or any response from them. All of the respective counsel for these parties have consented to this stay).

Since the Court has very recently issued its decisions as to five different motions to dismiss and they provide significant insight into the Court's overall thinking, we respectfully ask that this Court permit us time to carefully review our positions, consult with our client, and report back to the Court- on May 1, 2018, the date originally requested. During this time we will discuss the issues further with our client so we can present an informed final opinion. We appreciate this time as there are some competing vacation schedules internally as well. This approach would save considerable time and expense for the parties and hopefully for this Honorable Court.

Accordingly, we hereby request permission to submit a stipulation to be "so ordered" by the Court to continue to stay of such service by the Charter Oak Plaintiffs until May 1,

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2018 with respect to The Muslim World League, International Islamic Relief Organization, World Assembly of Muslim Youth, Al Haramain Islamic Foundation, Dallah Avco Trans Arabia, and Mohamed Binladin Company/Mohamed Binladin Organization.

Thank you for your kind consideration.

Respectfully submitted,

SHEPS LAW GROUP, P.C.



ROBERT C. SHEPS, Esq.

cc: All Counsel *via ECF*